

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

BEYOND SYSTEMS, INC.)
Plaintiff,)
v.) Case No. 8:08-cv-00921 (PJM) (CBD)
WORLD AVENUE USA, LLC, *et al.*)
Defendants.)

)

**DEFENDANT WORLD AVENUE USA, LLC'S MOTION TO COMPEL
PRODUCTION OF DOCUMENTS RESPONSIVE TO FOURTH REQUEST FOR
PRODUCTION**

Defendant World Avenue USA, LLC hereby moves to compel the production of documents responsive to its Fourth Request for Production issued to Plaintiff Beyond Systems, Inc. on grounds set forth in its Memorandum of Points and Authorities.

WHEREFORE, WORLD AVENUE USA, LLC respectfully requests that the Court overrule BEYOND SYSTEMS, INC.'s objections, compel the complete production of all responsive documents in the ordinary course of business or label them to correspond to the categories of the Fourth Request, issue an award of sanctions under Rule 37, and for such other and further relief as the Court deems just and appropriate.

Dated: May 14, 2010.

Respectfully submitted,

Attorneys for World Avenue USA, LLC

/s John L. McManus

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